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EXPRESSMD SOLUTIONS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Robert Bosch Healthcare Systems, Inc.,

Plaintiff,

v.

Express MD Solutions, LLC,

Defendant.

And Related Counterclaims.

Case No. 4:12-cv-00068-YGR

STIPULATION PURSUANT TO L.R. 6.1(b)
AND ~~[PROPOSED]~~ ORDER TO MODIFY
CASE SCHEDULING ORDER

Judge: Hon. Yvonne Gonzalez Rogers

Pursuant to Local Rule 6-1(b), Plaintiff and Counter-Defendant Robert Bosch Healthcare Systems, Inc. and Defendant and Counter-Claimant ExpressMD Solutions, LLC, by and through the undersigned counsel, hereby stipulate and agree to the following proposed modification to case schedule as set forth in the Order Setting Case Management Schedule (Dkt. No. 122), Order Setting Case Management Schedule (Dkt. No. 120), Order Setting Case Management Schedule (Dkt. No. 113) and the Order to Modify Case Scheduling Order (Dkt. No. 116):

Event	Current Deadline	Proposed New Deadline
Invalidity Contentions	March 27, 2015 (per Dkt. No. 122)	April 17, 2015
Exchange of Proposed Terms for Construction	April 3, 2015 (per Dkt. No. 122)	April 24, 2015
Exchange of Preliminary Claim Constructions and Extrinsic Evidence	April 24, 2015 (per Dkt. No. 122)	May 1, 2015
Joint Claim Construction and Prehearing Statement	May 5, 2015 (per Dkt. No. 120)	May 5, 2015

The proposed modification alters the case schedule to account for the fact that the parties are currently engaged in good faith settlement discussions. Extending the deadlines above will allow the parties to conserve resources as they continue to discuss the possibility of settlement.

This modification of the schedule will not alter any other dates currently set by the Court's Order Setting Case Management Schedule.

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1 **IT IS SO STIPULATED.**

2 Dated: March 27, 2015

Respectfully submitted,

3 ORRICK, HERRINGTON & SUTCLIFFE LLP

4 By: /s/ Bas de Blank

5 Bas de Blank

6 *Attorneys for Plaintiff and Counter-Defendant*
7 **ROBERT BOSCH HEALTHCARE SYSTEMS,**
8 **INC.**

8 Dated: March 27, 2015

DENTONS US LLP

9 By: /s/ Jennifer D. Bennett

10 Jennifer D. Bennett

11 *Attorneys for Defendant*
12 **EXPRESSMD SOLUTIONS, LLC**

13
14 **IT IS SO STIPULATED.**

15
16 Dated: Cr tkl8."4237



Honorable Yvonne Gonzalez Rogers
United States District Judge

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19 **FILER'S ATTESTATION**

20 I, Jennifer D. Bennett, am the ECF User whose ID and password are being used to file
21 this **Stipulation Pursuant to L.R. 6-1(b) and [Proposed] Order to Modify Case Scheduling**
22 **Order.** In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel whose e-
23 signature appears on the foregoing pages have concurred with this filing.

24
25 /s/ Jennifer D. Bennett

26 Jennifer D. Bennett

CERTIFICATE OF SERVICE

I, Jocasta Wong, hereby declare:

I am employed in the City and County of Palo Alto, California in the office of a member of the bar of this court whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Dentons US LLP, 1530 Page Mill Road, Suite 200, Palo Alto, California 94304.

On March 27, 2015, the following documents, described as:

**STIPULATION PURSUANT TO L.R. 6.1(b) AND [PROPOSED] ORDER
TO MODIFY CASE SCHEDULING ORDER**

to be served via CM/ECF by the Clerk of the Court, upon all counsel of record registered to receive electronic filing, as indicated on the Court's website, or by United States Mail, upon those parties not registered for electronic filing.

I declare under penalty of perjury that the above is true and correct. Executed on March 27, 2015, in Palo Alto, California.

/s/ Jocasta Wong

Jocasta Wong

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